

REMARKS

Initially, Applicants filed an Information Disclosure Statement (IDS) on December 8, 2004. The Examiner did not consider the foreign patent document (i.e., EP 1 107 128 A1) and the non-patent document (i.e., Monika Henzinger, "We Information Retrieval - an Algorithmic Perspective"). Applicants respectfully request that the Examiner consider these documents, initial at the appropriate place on the Form 1449, and return a copy of the Form 1449 with the next communication.

In the non-final Office Action, the Examiner rejected claims 1-63 under 35 U.S.C. § 102(b) as anticipated by Inaba et al. (U.S. Patent Application Publication No. 2002/0073065).

By this Amendment, Applicants amend the specification to improve form, and amend claims 1, 2, 5-7, 9, 10, 12-15, 17-19, 22-28, 30-34, 36-38, 40, 41, 43, and 45-53 to improve form. Applicants respectfully traverse the Examiner's rejections under 35 U.S.C. § 102. Claims 1-63 remain pending.

In paragraph 3 of the Office Action, the Examiner rejected claims 1-63 under 35 U.S.C. § 102(b) as allegedly anticipated by Inaba et al. Applicants traverse the rejection.

Initially, Applicants note that the Examiner included claims 38-51 in the grounds of rejection, but did not address any of these claims. Applicants assume that the Examiner mistakenly included claims 38-51 in the grounds for rejection but intended to identify these claims as containing allowable subject matter. If Applicants' assumption is incorrect, Applicants respectfully request clarification as to the status of claims 38-51.

A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention. Any feature not directly taught must be inherently present. In

other words, the identical invention must be shown in as complete detail as contained in the claim. See M.P.E.P. § 2131. Inaba et al. does not disclose or suggest the combination of features recited in claims 1-37 and 52-63.

Amended independent claim 1, for example, is directed to a method that comprises identifying a document; obtaining a plurality of types of history data associated with the document, the plurality of types of history data including at least two of: data relating to a document inception date, data relating to document changes, query analysis data, data relating to link-based criteria, data relating to anchor text, data relating to document traffic, data relating to user behavior, domain-related data, data relating to ranking history, user maintained or generated data, data relating to unique words, bigrams, or phrases in anchor text, data relating to linkage of independent peers, or data relating to document topics; and generating a score for the document based on the plurality of types of history data associated with the document.

Inaba et al. does not disclose or suggest the combination of features recited in claim 1. For example, Inaba et al. does not disclose or suggest obtaining a plurality of types of history data associated with the document, where the plurality of types of history data includes at least two of: data relating to a document inception date, data relating to document changes, query analysis data, data relating to link-based criteria, data relating to anchor text, data relating to document traffic, data relating to user behavior, domain-related data, data relating to ranking history, user maintained or generated data, data relating to unique words, bigrams, or phrases in anchor text, data relating to linkage of independent peers, or data relating to document topics. Instead, Inaba et al. discloses a history retrieval program that searches past retrievals to obtain information about users with similar interests and past query expressions (paragraph 0067).

Nowhere does Inaba et al. disclose or suggest a plurality of types of history data that includes at least two of: data relating to a document inception date, data relating to document changes, query analysis data, data relating to link-based criteria, data relating to anchor text, data relating to document traffic, data relating to user behavior, domain-related data, data relating to ranking history, user maintained or generated data, data relating to unique words, bigrams, or phrases in anchor text, data relating to linkage of independent peers, or data relating to document topics, as recited in claim 1.

For at least these reasons, Applicants submit that claim 1 is not anticipated by Inaba et al. Claims 2-37 depend from claim 1 and are, therefore, not anticipated by Inaba et al. for at least the reasons given with regard to claim 1.

Amended independent claim 52 is directed to a system that comprises means for identifying a document; means for obtaining a plurality of types of history data associated with the document, the plurality of types of history data including at least two from a group comprising: data relating to an inception date associated with the document, data relating to changes to the document, query analysis data relating to the document, data relating to link-based criteria associated with the document, data relating to anchor text associated with links to the document, data relating to traffic associated with the document, data relating to user behavior associated with the document, domain-related data associated with the document, data relating to ranking history associated with the document, user maintained or generated data relating to the document, data relating to unique words, bigrams, or phrases in anchor text associated with links to the document, data relating to linkage of independent peers, or data relating to a topic

associated with the document; and means for generating a score for the document based, at least in part, on the plurality of types of history data.

Inaba et al. does not disclose or suggest the combination of features recited in claim 52. For example, Inaba et al. does not disclose or suggest means for obtaining a plurality of types of history data associated with the document, where the plurality of types of history data includes at least two from a group comprising: data relating to an inception date associated with the document, data relating to changes to the document, query analysis data relating to the document, data relating to link-based criteria associated with the document, data relating to anchor text associated with links to the document, data relating to traffic associated with the document, data relating to user behavior associated with the document, domain-related data associated with the document, data relating to ranking history associated with the document, user maintained or generated data relating to the document, data relating to unique words, bigrams, or phrases in anchor text associated with links to the document, data relating to linkage of independent peers, or data relating to a topic associated with the document, for at least reasons similar to reasons given with regard to claim 1.

For at least these reasons, Applicants submit that claim 52 is not anticipated by Inaba et al.

Amended independent claim 53 is directed to a system that comprises a history component configured to obtain a plurality of types of history data associated with a document, the plurality of types of history data including at least two of: data relating to an inception date associated with the document, data relating to changes to the document, query analysis data relating to the document, data relating to link-based criteria associated with the document, data

relating to anchor text associated with links to the document, data relating to traffic associated with the document, data relating to user behavior associated with the document, domain-related data associated with the document, data relating to ranking history associated with the document, user maintained or generated data relating to the document, data relating to unique words, bigrams, or phrases in anchor text associated with links to the document, data relating to linkage of independent peers, or data relating to a topic associated with the document; and a ranking component configured to generate a score for the document based, at least in part, on the plurality of types of history data associated with the document.

Inaba et al. does not disclose or suggest the combination of features recited in claim 53. For example, Inaba et al. does not disclose or suggest a history component configured to obtain a plurality of types of history data associated with a document, where the plurality of types of history data includes at least two of: data relating to an inception date associated with the document, data relating to changes to the document, query analysis data relating to the document, data relating to link-based criteria associated with the document, data relating to anchor text associated with links to the document, data relating to traffic associated with the document, data relating to user behavior associated with the document, domain-related data associated with the document, data relating to ranking history associated with the document, user maintained or generated data relating to the document, data relating to unique words, bigrams, or phrases in anchor text associated with links to the document, data relating to linkage of independent peers, or data relating to a topic associated with the document, for at least reasons similar to reasons given with regard to claim 1.

For at least these reasons, Applicants submit that claim 53 is not anticipated by Inaba et al.

Independent claim 54 is directed to a method for ranking a linked document that comprises determining an age of linkage data associated with the linked document; and ranking the linked document based on a decaying function of the age of the linkage data.

Inaba et al. does not disclose or suggest the combination of features recited in claim 54. For example, Inaba et al. does not disclose or suggest determining an age of linkage data associated with a linked document.

The Examiner rejected claim 54 by generally referring to the rejection of claims 1-17 (Office Action, page 4). Claims 1-17 do not recite the above-identified feature of claim 54. Therefore, the Examiner did not establish a proper rejection of claim 54 by referring generally to the rejection of claims 1-17.

For at least these reasons, Applicants submit that claim 54 is not anticipated by Inaba et al. Claims 55-63 depend from claim 54 and are, therefore, not anticipated by Inaba et al. for at least the reasons given with regard to claim 54.

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of pending claims 1-63.

As Applicants' remarks with respect to the Examiner's rejections overcome the rejections, Applicants' silence as to certain assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the

right to dispute these assertions/requirements in the future.

If the Examiner does not believe that all pending claims are now in condition for allowance, the Examiner is urged to contact the undersigned to expedite prosecution of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: March 27, 2007

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